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April 24, 2012

Hon. Michael A. Shipp
United States District Court
Martin Luther King Jr. Federal Bldg.
50 Walnut Street
Newark, NJ 07101

Re: White v. Smiths Detection, Inc.
Docket No. 2:10-cv-04078-SRC/MAS

Dear Judge Shipp:

This firm represents the Plaintiff, Sally White, in the above-captioned matter. Discovery in this case was held in abeyance pending mediation which occurred on March 23, 2012. After mediation, counsel consented to put a hold on discovery for another two weeks to continue discussions. At this point, it is necessary to return to the court and request assistance with scheduling and other matters going forward. There are three points I wish to raise.

First, Ms. White seeks leave to file a Second Amended Complaint. In February and March, before this case was been put on hold, Defendants delivered documents and I received responses to subpoenas from third parties. This evidence forms the basis of amendments to the Plaintiff's claims. I advised defense counsel of my intention to seek leave to file a Second Amended Complaint. I will appreciate receiving Your Honor's instruction on how you wish me to proceed in that regard.

The parties also await the court's resolution of discovery disputes. Counsel submitted Joint Letters of Counsel to the Court in January and February and Your Honor postponed addressing the disputes pending the mediation. Ms. Bouchard indicated that she wishes to present the defense witnesses for depositions only once, which would not be the case if the complaint was amended after I take deposition. This has delayed the scheduling of the defense witness depositions. I will be grateful for Your Honor's instructions regarding these discovery issues.

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Finally, the discovery end date is May 7, 2012, but under these circumstances, I ask the court to extend the discovery period to allow the resolution of these issues.

Thank you for your guidance and assistance.

Respectfully submitted,
LAW OFFICE OF ELLEN O'CONNELL, L.L.C.

s/Ellen O'Connell

By: _____
Ellen O'Connell

cc: Sara Bouchard, Esq.
W. John Lee, Esq.
Jyotin Hamid, Esq.